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January 24, 2002

Via Facsimile and U.S. Mail

Mr. Charlie Root
USEPA – Region 3
1650 Arch Street, 3HS21
Philadelphia, PA 19103-2029

RE: Malvern TCE Superfund Site – Pre-Design Investigation Schedule

Dear Mr. Root:

On behalf of the Chemelene Site Defense Group (CSDG), attached please find a schedule prepared by Golder Associates for the remaining pre-design investigation activities at the Malvern TCE Superfund Site. The end result of this phase of work will be a Pre-Design Investigation Report (PDI Report) which will be submitted to the USEPA no later than May 3, 2002. As originally proposed, this submittal will also include a Focused Feasibility Study (FFS) containing a conceptual design for an SVE System to replace the Selected Remedy of excavation and off-site treatment and disposal for contaminated soils in the FDA/MA.

We discussed the possibility of meeting prior to delivery of the PDI Report in order to review the results of the pre-design investigation studies and to discuss the anticipated contents of the Report. Based on the attached schedule, it appears that the best opportunity to do this may be sometime during the second week in March, since Golder expects to be in a position to discuss the conceptual layout for an SVE System at the FDA/MA by this time.

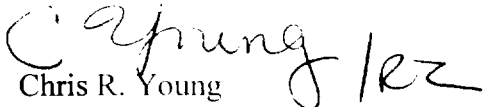
As presented during our last meeting, groundwater flow directions across the Site, particularly in the FDA/MA, have been difficult to establish requiring additional hydraulic monitoring. While we will be in a position to update the USEPA on the status of this monitoring, which is currently being performed, not all of the proposed groundwater information will be available for the above meeting. As proposed in the attached schedule, this information would be submitted as an addendum to the PDI Report to expedite its completion. It is expected that there will be sufficient information in the PDI Report to initiate the design work pending submittal of this addendum.

Charlie Root
January 24, 2002
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If you have any questions regarding the attached information or if you would like to discuss specific dates for the above referenced meeting, please contact me at (610) 435-1151.

Sincerely,

de maximis, inc.


Chris R. Young
Project Coordinator

Attachment

CC: Chemclene Site Defense Group (CSDG)
FILE: 3138A.03/Predesign Investigation Schedule

AR303601

From: "White, Randy" <White@golder.com>
To: 'Chris Young' <cyoung@demaximis.com>
Date: 1/21/02 9:03AM
Subject: FW: Malvern Schedule

> Chris:
> As requested, the following provides the anticipated schedule of the
> remaining PDI field work (excluding the ongoing FDA groundwater
> monitoring), data evaluation, meetings, and deliverables:
>
> SVE Pilot
> * Lab analyses completed by end of January
> * Physical data evaluation (flow, mass removal, vacuum response, etc)
> completed by mid-February
> * Preliminary conceptual layout of SVE system for the purpose of
> discussion with USEPA by the first week of March
> * Report submitted to USEPA as an Appendix to the PDI Report discussed
> below
>
> PDI Report
> * Slug tests, analysis of slug test and RI pumping test data, and
> selection of pumping rate for CC-23 injection test completed on or about
> 1/21
> * Provide letter to USEPA during the week of 1/21 proposing
> redevelopment of CC-23 and injection test pumping rate
> * Well redevelopment and injection test week of 1/28 (weather
> permitting)
> * MPA groundwater data evaluation and preliminary conceptual model
> refinement by end of February
> * PDI Report preparation following meeting with EPA, submit PDI Report
> to USEPA tentatively during the first week of May
>
> FFS
> * FFS preparation will begin in mid-February and the report submitted
> to USEPA concurrently with the PDI Report schedule above
>
> Based on the above schedule, we would be prepared to meet with USEPA
> during the second week of March. As you know, the FDA groundwater PDI
> activities are ongoing. Consequently, there will be some data gaps with
> respect to the overall site hydrogeochemical model that we will need to
> discuss at the USEPA meeting. As an example, the need for and specifics
> of any Valley Creek monitoring program cannot be developed until the FDA
> groundwater assessment is completed.
>
> Regards,
> Randy

CC: "Kane, Allen" <AKane@golder.com>, "Ley, David" <DLey@golder.com>

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